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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ARIEL ABITTAN,

PLAINTIFF,

v.

LILY CHAO (a/k/a TIFFANY CHEN, a/k/a
YUTING CHEN), DAMIEN DING (a/k/a
DAMIEN LEUNG, a/k/a DAMIEN RAY
DONOVAN, a/k/a TAO DING),
TEMUJIN LABS INC. (a Cayman Islands
corporation), and Does 1-100, inclusive,

DEFENDANTS.

Case No. 5:20-CV-09340-NC

**DECLARATION OF CRAIG A. HANSEN
IN RELATION TO ARIEL ABITTAN'S
SUBPOENA TO PRODUCE
DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT
INSPECTION OF PREMISES IN A
CIVIL ACTION**

Judge: Hon. Nathanael Cousins

1 I, Craig A. Hansen, declare as follows:

2 1. I am an attorney and principal of the Hansen Law Firm, P.C. (“Hansen Law Firm”),
3 former counsel for Defendants in this matter. I have personal knowledge of the facts stated herein,
4 unless stated on information and belief, and if called upon to testify to those facts I could and would
5 competently do so.

6 2. On May 11, 2023, Hansen Law Firm was served with a *Subpoena to Produce*
7 *Documents, Information, or Objects Or to Permit Inspection of Premises in a Civil Action* by
8 Plaintiff Ariel Abittan in this matter (the “Subpoena”). A true and correct copy of the Subpoena is
9 attached hereto as **Exhibit 1**.

10 3. On May 24, 2023, Hansen Law Firm served *Hansen Law Firm, P.C.’s Objections*
11 *to Subpoena to Produce Documents, Information, Or Objects or to Permit Inspection of Premises*
12 *in a Civil Action* (“HLF’s Objections”) upon counsel for Ariel Abittan and current counsel for
13 Defendants in this matter. A true and correct copy of HLF’s Objections is attached hereto as
14 **Exhibit 2**.

15 4. On June 7, 2023, Plaintiff Ariel Abittan’s counsel requested a date to meet and
16 confer with Hansen Law Firm in relation to HLF’s Objections. A true and correct copy of this
17 email is attached hereto as **Exhibit 3**.

18 5. On June 9, 2023, Hansen Law Firm responded to Plaintiff Ariel Abittan’s counsel
19 via letter, a true and correct copy of which is attached hereto as **Exhibit 4**.

20 6. Hansen Law Firm has incurred substantial attorney time in reviewing the Subpoena,
21 drafting and serving HLF’s Objections, writing a meet and confer letter in connection with HLF’s
22 Objections, attending the hearing in relation to the *Joint Statement of Discovery Dispute Re: Law*
23 *Firm Subpoenas* (DKT No. 193), and drafting this declaration. The specific attorneys who spent
24 time responding to the Subpoena include Steve Holmes, Phil Yeager, Collin Greene, and me. These
25 attorneys could and should have spent such time working on other cases rather than responding to
26 the Subpoena and related meet and confer. My billing rate is \$500.00 per hour, Stephen Holmes
27 billing rate is \$450.00 per hour, Philip Yeager’s billing rate is \$350.00 per hour, and Collin
28

Greene's billing rate is \$300.00 per hour. In total, Hansen Law Firm lost the equivalent of \$5,820.00 in attorney time in relation to the Subpoena, as the following table demonstrates:

Attorney	Hourly Rate	Hours	Totals
Craig Hansen	\$500.00	1.6	\$800.00
Stephen Holmes	\$450.00	0.4	\$180.00
Phil Yeager	\$350.00	7.4	\$2,590.00
Collin Greene	\$300.00	7.5	\$2,250.00
		16.9	\$5,820.00

DATED: June 21, 2023

San Jose, California

/s/ Craig Alan Hansen

Craig Alan Hansen
HANSEN LAW FIRM, P.C.